

**Supporting Statement for the  
Electronic Benefit Verification (BEVE)  
Internet Application  
20 CFR 401.40  
OMB No. 0960-0595**

**A. Justification**

1. **Introduction/Authoring Laws and Regulations** - The *Privacy Act of 1974* requires Federal agencies to permit individuals access to information pertaining to them. The Social Security Administration (SSA) provides information to beneficiaries on the status and amount of their benefits by authority of section 205(a) of the *Social Security Act* and 20 CFR 401.40(b) of the *Code of Federal Regulations*.
2. **Description of Collection** - SSA established the Electronic Benefit Verification (BEVE) Internet service to provide Social Security beneficiaries and Supplemental Security Income (SSI) recipients the convenience of requesting a proof-of-income statement through the Internet. To obtain a BEVE, requesters must identify the type of information from SSA records they need by selecting one or more check blocks on the electronic request form. Requesters must also provide name and social security number (SSN) or claim number (the SSN under which they receive payments; e.g., spouse's SSN) and several identifying elements required for authentication.

Beneficiaries and SSI recipients may request a BEVE letter for proof of income for obtaining housing, food stamps or other public services. Having verified the requester's identity, the information we collect is to create and provide the BEVE letter. SSA ensures appropriate confidentiality by mailing the BEVE letter to the address listed in existing SSA records for the requester. The respondents are Social Security title II and Medicare beneficiaries, and SSI recipients.

The agency is also creating an enhanced version of the BEVE Internet service with the release of the new Internet Benefit Verification (iBEVE) application. The enhanced iBEVE Internet service will allow the same current BEVE service the public uses to access proof-of-income and benefit information. However, the new iBEVE service/application will allow the public instant online access to their benefit information. Since this enhanced service will allow instant access to benefit information (unlike the current BEVE service that mails the information via U.S. Postal Service), an enhanced authentication process is necessary. Therefore, the agency will enforce the use of our new Public Credentialing and Authentication Process for all iBEVE users. SSA will soon be submitting a new Information Collection Request to OMB for the Public Credentialing and Authentication Process. Future iBEVE users will be required to pass the Public Credentialing and Authentication Process, prior to entering into the new iBEVE application.

3. **Use of Information Technology to Collect the Information** – In accordance with the Government Paperwork Elimination Act, we are developing and expanding the BEVE to iBEVE.
4. **Why We Cannot Use Duplicate Information** - The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. There is no other collection instrument SSA uses that collects similar data.
5. **Minimizing Burden on Small Respondents** - This information collection does not affect small businesses or other small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently** - Our failure to provide a timely BEVE could result in loss of services for the affected beneficiaries or SSI recipients. Making the service available electronically provides a requested service and added convenience to the public, and saves them the effort of phoning or visiting an SSA field office or teleservice center. There are no technical or legal obstacles preventing burden reduction.
7. **Special Circumstances** - There are no special circumstances that would cause SSA to collect the information in a manner inconsistent with 5 CFR 1320.5.
8. **Solicitation of Public Comment and Other Consultations with the Public** - SSA published the 60-day advance Federal Register Notice on January 28, 2010 at 76 FR 5233, and SSA received no public comments. We published the 30-day Notice on April 1, 2011 at 76 FR 18290. If we receive any comments on the second Notice, we will forward them to OMB. We did not consult with members of the public.

We published the 30-day Notice on April 1, 2011 with burden data covering only the BEVE application. Since we will soon be implementing the enhanced application, iBEVE, and for a limited time offering both Internet applications to the public simultaneously, we re-published the 30-day Notice on June 30, 2011 at 76 FR 38449 to include the adjusted burden. We have also adjusted the burden in item #12 to reflect this action.

9. **Payment of Gifts to Respondents** - SSA provides no payment or gifts to the respondents.
10. **Assurances of Confidentiality** - SSA protects and holds confidential the information it collects in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974), and OMB Circular No. A-130.

SSA assures the confidentiality of the requester in several ways: We encrypt all electronic requests using the Secure Socket Layer (SSL) security protocol. SSL

encryption helps to prevent a third party from reading the transmitted data even if intercepted. This protocol is an industry standard, and is used by banks such as Wells Fargo and Bank of America for Internet banking.

The BEVE application gives the requester adequate warnings the Internet is an open system and there is no absolute guarantee others will not intercept and decrypt the personal information they have entered. We advise the requester of alternative methods for requesting a benefit verification letter or BEVE, e.g., personal visit to an SSA field office or telephone call to SSA's national 800 number. We return the BEVE to the requester via U.S. mail using the address of record, rather than by way of the Internet (i.e., online).

The iBEVE application will provide instant online access to the benefit verification letter upon successful authentication. In addition, we will present information about online security to users prior to entering the iBEVE application. Alternative methods of attaining a benefit verification letter, such as contacting an SSA field office or SSA's national 800 number will remain the same.

The Privacy Act of 1974 protects the information we collect from beneficiaries and SSI recipients. In addition, SSA maintains a privacy policy for Internet services that ensures confidentiality of all information provided by the requester of a BEVE.

SSA's Internet privacy policy is:

- The public does not have to provide personal information to visit our site.
- SSA collects personally identifiable information (name, e-mail address, SSN or other unique identifier) only when specifically and knowingly provided by the requester.
- We will only use personally identifying information provided by the requester in connection with Social Security Online or for such other purposes as we describe at the point of collection.
- SSA sometimes performs statistical analyses of user behavior to measure customer interest in the various areas of our site. Disclosure of this information to third parties is only in aggregate form.
- SSA does not give, sell, or transfer any personal information to a third party.
- SSA does not enable "cookies." (A "cookie" is a file placed on your hard drive by a Web site that allows it to monitor your use of the site, usually without your knowledge.)

11. **Justification for Sensitive Questions** - The information collection does not involve any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden** - Approximately 870,958 respondents use the BEVE annually. The estimated response time is 5 minutes, for 72,580 burden hours. This figure represents burden hours, and we did not calculate a separate cost burden.

With the release of the iBEVE application, the agency anticipates the response time will decrease since the application’s authentication process does not reside within the iBEVE application, but rather through the new Public Credentialing and Authentication Process application. This minimizes the number of screens within iBEVE. We anticipate 1,007,744 respondents will use iBEVE annually. The estimated response time is 4 minutes, for 67,183 burden hours. Since we have not yet released iBEVE to production, we will monitor the use of the application via tracking mechanisms available in the management information we collect to determine future response and burden hour timeframes.

SSA will simultaneously offer the public the current BEVE application along with the new iBEVE application until we successfully establish the national implementation of the Public Credentialing and Authentication Process and MySocialSecurity.gov initiatives. This is to insure our current BEVE users can access the new iBEVE application under the new Public Credentialing and Authentication Process and MySocialSecurity.gov framework. Upon successful national implementation of both the Public Credentialing and Authentication Process and MySocialSecurity initiatives, SSA expects to retire the current BEVE application.

<b>Application</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden per Response (minutes)</b>	<b>Total Annual Burden (hours)</b>
BEVE	870,958	1	5	72,580
iBEVE	1,007,744	1	4	67183
<b>Totals</b>	<b>1,878,702</b>			<b>139,763</b>

13. **Annual Cost to the Respondents** - There is no known cost burden to the respondents.
14. **Annual Cost to Federal Government** - Since this is an Internet collection, there is no annual cost to the Federal Government for printing and distribution. It is not possible to determine the cost for upkeep of the Internet site or collecting the information, as these are costs associated with the upkeep of SSA’s website as a whole.
15. **Program Changes or Adjustments to the Information Collection** – The increase in the public reporting burden of BEVE is a result of the public having greater access to, and are more comfortable with using, the Internet.
16. **Plans for Publication Information Collection Results** – SSA will not publish the results of the information collection.

17. **Displaying the OMB Approval Expiration Date** - SSA is not requesting an exception to the requirement to display the OMB approval expiration date.
18. **Exception to Certification Statement** - SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

**B. Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.